

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
Dallas Division**

CHARLENE CARTER,

Plaintiff,

v.

SOUTHWEST AIRLINES CO., AND
TRANSPORT WORKERS UNION OF AMERICA,
LOCAL 556,

Defendants.

Civil Case No. 3:17-cv-02278-X

**CARTER'S DEPOSITION DESIGNATIONS
FOR BRIAN TALBURT**

Pursuant to this Court's requests and instructions at the June 16, 2022 pretrial conference, Plaintiff Charlene Carter hereby submits Deposition Designations for Brian Talburt.¹ Carter received a copy of Mr. Talburt's deposition transcript on Monday, July 4, 2022 at 10:02 a.m. CT.

Deposition Testimony Designation

Carter submits the following deposition designations in the event this witness's live testimony cannot be secured:

Deposition of Brian Talburt

6:1-7:2
7:3-7:8
8:20-13:6
13:10-15:1
15:6-12
17:23-18:5
19:5-23
20:3-21:4

¹ Transcript of June 16, 2022 Pretrial Conference, Tr.164:19-165:18.

21:5-11
21:12-26:10
26:19-27:22
27:25-32:1
32:5-34:3
34:9-19
35:11-37:19
37:22-38:25
39:14-40:14
40:16-25
42:2-44:15
44:16-20
44:22-24
44:25-45:3
45:5-13
47:7-47:9
47:13-50:8
52:13-52:23
53:6-54:10
54:24-55:3
55:15-55:24
57:6-60:6
60:14-61:20
62:3-64:9
64:12-65:24
66:4-66:13
66:25-67:17, 67:19
68:16-68:20
69:7-12
69:14-72:4
72:11-15
74:19-76:13
76:14-77:19
77:20-78:19
78:25-79:3
79:7-79:25
80:5-81:10
81:18-83:19
84:20-85:4
85:10-87:9
87:10-87:15
88:4-89:6
89:8-91:17
91:19-23
92:5-92:11

92:16-92:21
93:8-94:11
94:24-96:2
96:5-97:10, 97:12
97:14-98:8
98:10-99:15
99:17-101:10
101:16-101:24
102:23-103:3
103:23-107:16
107:24-108:17
109:11-109:19
110:20-111:1
111:4-111:17
111:24-113:11
113:26-116:7
116:10-118:5
118:11-23
119:4-21
119:23-120:12
120:16-19
121:1-123:11
123:13-125:16
126:13-128:25
129:3-129:24
130:20-141:4
141:12-145:2
146:2-147:14
147:15-19
151:1-154:4 ²
154:8-9

DATED: July 5, 2022

Respectfully submitted,

/s/ Matthew B. Gilliam

Matthew B. Gilliam (*admitted pro hac vice*)
New York Bar No. 5005996
c/o National Right to Work Legal Defense
Foundation, Inc.

² For this designation, Carter reserves the right to present such testimony if Carter's objections to the admissibility of evidence relating to the Last Chance Agreement are overruled.

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**ATTORNEYS FOR PLAINTIFF
CHARLENE CARTER**

Certificate of Service

I hereby certify that on July 5, 2022, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

s/ Matthew B. Gilliam